

1 Lawrence J. Semenza, III, Esq., Bar No. 7174
 2 Email: ljs@semenzalaw.com
 3 Christopher D. Kircher, Esq., Bar No. 11176
 4 Email: cdk@semenzalaw.com
 5 LAWRENCE J. SEMENZA, III, P.C.
 6 10161 Park Run Drive, Suite 150
 7 Las Vegas, Nevada 89145
 Telephone: (702) 835-6803
 Facsimile: (702) 920-8669

8 *Attorneys for Defendant Jesse Estrada*

9
 10 **UNITED STATES DISTRICT COURT**
 11
 12 **DISTRICT OF NEVADA**

13 DEBRA L. ROBELLO, 14 vs. 15 MANDALAY CORP. dba MANDALAY 16 BAY RESORT & CASINO, a Nevada Corporation; JESSE ESTRADA, an individual, Defendants.	17 Plaintiff, 18 19 20 21 22	23 Case No.: 2:14-cv-00456-APG-VCF 24 STIPULATION AND ORDER TO STAY 25 PROCEEDINGS (FIRST REQUEST)
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26 Plaintiff Debra L. Robello ("Robello"), Defendant Mandalay Corp. dba Mandalay Bay
 27 Resort & Casino ("Mandalay") and Defendant Jesse Estrada ("Estrada") (together, the "Parties"),
 by and through their undersigned counsel of record, hereby stipulate and agree to stay this case in
 its entirety until the conclusion of criminal proceedings currently pending against Estrada (Clark
 County Justice Court Criminal Case No. 14F09273X) that directly relate to the allegations
 contained in Robello's Complaint in this case.

28 The Parties hereby stipulate to the following:

29 1. The Parties hereby agree to stay this case in its entirety until the conclusion of
 30 criminal proceedings currently pending against Estrada (Clark County Justice Court Criminal
 31 Case No. 14F09273X) that directly relate to the allegations contained in Robello's Complaint in
 32 this case. The Parties, however, reserve their right to file an appropriate motion with the Court

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1 seeking to lift the stay if at any time they deem it appropriate, with the remaining Parties to the
2 litigation reserving their right to oppose the motion.

3 2. The Parties hereby request that the Court schedule a status check every six (6)
4 months so that the Parties can inform the Court of the status of the criminal proceedings against
5 Estrada.

6 3. At the conclusion of the stay, the Parties shall have an additional 120 days to
7 complete discovery, with any further requests for an extension of the discovery deadline to be
8 made no later than 21 days prior to the deadline. The deadline for filing motions to amend the
9 pleadings or to add parties shall be 90 days before the discovery cut-off as provided for in LR 26-
10(e)(2). The date for disclosing expert witnesses shall be no later than 60 days before the close of
11 discovery as provided for in LR 26-1(e)(3). The date for disclosing rebuttal expert witnesses shall
12 be no later than 30 days after expert disclosures. The date for filing the Interim Status Report
13 shall be no later than 60 days before the discovery cut-off date as provided for in LR 26-3. The
14 date for dispositive motions shall be no later than 30 days after the discovery cut-off date as
15 provided for in LR 26-1(e)(4). As provided for in rule LR 26-1(e)(5), if no dispositive motions
16 are filed, the Joint Pretrial Order shall be filed no later than 30 days after the date set for filing
17 dispositive motions. In the event dispositive motions are filed, the date for filing the joint pretrial
18 order shall be suspended until 30 days after decision of the dispositive motions or further order of
19 the Court.

20 DATED: 09/22/14

LAW OFFICES OF MICHAEL P. BALABAN

21 BY: /s/ Michael P. Balaban

22 Michael P. Balaban

23 10726 Del Rudini Street

24 Las Vegas, NV 89141

25 Attorneys for Plaintiff Debra L. Robello

LAWRENCE J. SEMENZA, III, P.C.
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

1 DATED: 09/22/14

JACKSON LEWIS P.C.

2 BY: /s/ Erica J. Kelly

3 Deverie J. Christensen

4 Erica J. Kelly

5 3800 Howard Hughes Parkway, Suite 600

6 Las Vegas, NV 89169

7 *Attorneys for Defendant Mandalay Corp. dba
Mandalay Bay Resort & Casino*

8 DATED: 09/22/14

9 LAWRENCE J. SEMENZA, III, P.C.

10 BY: /s/ Lawrence J. Semenza, III

11 Lawrence J. Semenza, III

12 10161 Park Run Drive, Suite 150

13 Las Vegas, NV 89145

14 *Attorneys for Defendant Jesse Estrada*

15 **IT IS SO ORDERED.**

16 Dated this ____ day of September, 2014.

17 Honorable Andrew P. Gordon
18 United States District Court Judge

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Las Vegas, Nevada 89145
Telephone: (702) 835-6803